REMARKS

Reconsideration of the rejection is, again, requested. The claims have been amended to preclude any attempt to read application as a non-software application. Thus, there is no basis for the maintenance of the rejection.

Nothing in the cited Kalliokulju teaches turning off any software when the mobility management state is idle. The reliance on paging signaling not being conducted is not the result of any software being closed. Instead, it is clearly a result of the fact that, in the idle state, the mobile station is not connected to the packet network and, as a result, paging signaling is not possible. There is no indication whatsoever anywhere in the reference that any software is closed automatically when the mobility management state is idle.

Therefore, the rejection should be reconsidered.

Respectfully submitted,

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